IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

In re: SUBPOENA FOR INSPECTION AND SAMPLING OF PREMISES OWNED BY NON-PARTIES IN THE MATTER OF:

STATE OF OKLAHOMA, et al. Plaintiffs

Case No. 4:05-CV-00329-TCK-SAJ

vs.

TYSON FOODS, INC., et al., Defendants.

JIM L. PIGEON'S AND MICHELE R. PIGEON'S RESPONSE TO ORDER TO FILE CORPORATE DISCLOSURE STATEMENT

Jim L. Pigeon and Michele R. Pigeon respectfully submit the following Response to the Court's Minute Order directing them to file a corporate disclosure statement pursuant to Rule 7.1 of the Federal Rules of Civil Procedure:

By and through their undersigned attorneys, Jim L. Pigeon and Michele R. Pigeon certify that to the best of their knowledge, information and belief, they are individuals, and therefore not required to file a corporate disclosure statement pursuant to Rule 7.1 of the Federal Rules of Civil Procedure.

Respectfully submitted,

s/ D. Kenyon Williams, Jr.

Michael D. Graves, OBA #3539
D. Kenyon Williams, Jr., OBA #9643
HALL, ESTILL, HARDWICK, GABLE,
GOLDEN & NELSON, P.C.
320 South Boston Avenue, Suite 400
Tulsa, OK 74103-3708
Telephone (918) 594-0400
Facsimile (918) 594-0505

ATTORNEYS FOR POULTRY GROWERS

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2006, a copy of the above and foregoing was mailed via facsimile to the following counsel of record:

C Miles Tolbert

Secretary of the Environment State of Oklahoma 3800 N. Classen Oklahoma City, OK 73118 405-530-8800

Fax: 405-530-8990

William H Narwold

Motley Rice LLC (Hartford) 20 Church St., 17th Floor Hartford, CT 06103 860-882-1676

Fax: 860-882-1682

and that an electronic version of the same was sent this date to the following:

Douglas Allen Wilson

Email: Doug Wilson@riggsabney.com

Frederick C Baker

Email: fbaker@motleyrice.com

John Trevor Hammons

Email: thammons@oag.state.ok.us

Melvin David Riggs

Email: driggs@riggsabney.com

Robert Allen Nance

Email: rnance@riggsabney.com

W A Drew Edmondson

Email: fc docket@oag.state.ok.us

Dorothy Sharon Gentry

Email: sgentry@riggsabney.com

Elizabeth C Ward

Email: lward@motleyrice.com

James Randall Miller

Email: rmiller@mkblaw.net

Louis Werner Bullock

Email: lbullock@mkblaw.net

Richard T Garren

Email: rgarren@riggsabney.com

Sharon K Weaver

Email: sweaver@riggsabney.com

David Phillip Page

Email: dpage@mkblaw.net

Kelly S Hunter Burch

Email: fc.docket@oag.state.ok.us

s/D. Kenyon Williams, Jr.

D. Kenyon Williams, Jr.

624971.1:712304:00550